

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

PAUL PIZZUTO,)	
Plaintiff,)	
)	
v.)	DOCKET NO. 04-12492 GAO
)	
AIRBORNE EXPRESS, INC., STEVEN)	
CROSSKEN, JOSEPH HAMILTON,)	
GREG SWEATT AND ARTHUR)	
LEVERIS,)	
Defendants.)	

**JOINT MOTION TO EXTEND TIME FOR COMPLETION OF FACT DISCOVERY
AND FOR CONTINUANCE OF STATUS CONFERENCE**

The parties respectfully move to extend the time for completion of fact discovery from December 31, 2005 to March 31, 2006, and to continue the Status Conference from January 23, 2006 to a date in mid-April 2006. In support of this motion, the parties state:

1. This is a fairly complex employment discrimination case involving numerous potential witnesses.
2. The parties are currently engaged in responding to written discovery requests preliminary to the scheduling of depositions. The written discovery process has taken longer than the parties originally expected at the Scheduling Conference. The parties agree that, if this motion is allowed, they will serve responses to written discovery on or before January 16, 2006, and that the extension of the discovery period beyond that date is solely for purposes of conducting fact witness depositions.
3. At the Scheduling Conference held in July 2005,, the Court set the deadline for the completion of fact discovery by December 31, 2005 and scheduled a Status Conference thereafter, at which time further discovery and motion deadlines would be set.

4. The parties ask the Court to grant the requested extension so that the parties can engage in necessary deposition discovery to narrow the issues.

5. This is the first motion of the parties to extend the discovery deadline.

WHEREFORE, for the foregoing reasons, the parties respectfully request that the deadline for completion of fact discovery be extended from December 31, 2005 to March 31, 2006 and that the Status Conference be continued from January 23, 2006 to a date in mid-April 2006.

PAUL PIZZUTO,

AIRBORNE EXPRESS, INC., STEVEN
CROSSKEN, JOSEPH HAMILTON,
GREG SWEATT, AND ARTHUR
LEVERIS,

By his attorneys,

By their attorneys,

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Dated: December 1, 2005.